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SHENZHEN SAMSUNG SDI CO., LTD. and  
TIANJIN SAMSUNG SDI CO., LTD.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Case No. 07-5944 SC  
MDL No. 1917

This Document Relates to:

*Sharp Electronics Corp., et al. v. Hitachi Ltd.,  
et al.*, No. 13-cv-1173;

*Sharp Elecs. Corp. v. Koninklijke Philips  
Elecs. N.V.*, No. 13-cv-02776;

*Siegel v. Hitachi, Ltd.*, No. 11-cv-05502;

*Siegel v. Technicolor SA, et al.*, No. 13-cv-  
05261;

**DECLARATION OF HELEN C. ECKERT  
IN SUPPORT OF SDI DEFENDANTS'  
ADMINISTRATIVE MOTION TO SEAL  
DOCUMENTS PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5**

**[RE REPLY BRIEF IN SUPPORT OF  
SDI'S MIL NO. 2]**

1 *Best Buy Co., et al. v. Hitachi, Ltd., et al.,*  
2 No. 11-cv-05513;

3 *Best Buy Co., et al. v. Technicolor SA, et al.,*  
4 No. 13-cv-05264;

5 *Target Corp. v. Chunghwa Picture Tubes,*  
6 *Ltd., et al.,* No. 11-cv-05514;

7 *Target Corp. v. Technicolor SA, et al.,* No. 13-  
8 cv-05686;

9 *Sears, Roebuck and Co. and Kmart Corp. v.*  
10 *Chunghwa Picture Tubes, Ltd.,* No. 11-cv-  
11 05514;

12 *Sears, Roebuck and Co. and Kmart Corp. v.*  
13 *Technicolor SA,* No. 13-cv-05262;

14 *Viewsonic Corp. v. Chunghwa Picture Tubes,*  
15 *Ltd.* No. 14-cv-02510.

1 I, Helen C. Eckert, declare as follows:

2 1. I am an associate at the law firm of Sheppard Mullin Richter & Hampton LLP,  
3 counsel of record for Defendants Samsung SDI America, Inc.; Samsung SDI Co., Ltd.; Samsung  
4 SDI (Malaysia) SDN. Bhd.; Samsung SDI Mexico S.A. De C.V.; Samsung SDI Brasil Ltda.;  
5 Shenzhen Samsung SDI Co., Ltd.; and Tianjin Samsung SDI Co., Ltd. (collectively, "SDI"). I  
6 submit this declaration pursuant to Civil Local Rule 79-5(d) to establish that portions of  
7 Defendants' Reply Brief In Support Of Their Motion *In Limine* To Exclude Irrelevant And Highly  
8 Prejudicial Portions of Plaintiffs' Trial Exhibit, Bates Stamped TSA-CRT-00077732 ("Reply iso  
9 SDI's MIL No. 2") which quotes, identifies, or compiles information designated "Confidential"  
10 and "Highly Confidential" pursuant to the Stipulated Protective Order entered on June 18, 2008  
11 (Dkt. No. 306) are sealable. Except for those matters stated on information and belief, about  
12 which I am informed and which I believe to be true, I have personal knowledge of the matters set  
13 forth herein and could and would testify competently to each of them.

14 2. The parties have disclosed or produced in this action certain documents and  
15 information designated as either "Confidential" or "Highly Confidential" pursuant to the  
16 Stipulated Protective Order entered on June 18, 2008 (Dkt. No. 306).

17 3. On March 6, 2015, SDI filed an Administrative Motion to Seal and lodged the  
18 Reply iso SDI's MIL No. 2 under seal pursuant to Civil Local Rules 7-11 and 79-5(d) and (e).

19 4. Pursuant to Civil Local Rule 79-5(d), I make this declaration on behalf of SDI to  
20 provide the basis for the Court to maintain under seal portions of the Reply iso SDI's MIL No. 2  
21 which quotes, identifies, or discusses information included in Exhibit 1 to the Declaration of  
22 James L. McGinnis In Support of Defendants' Motion *In Limine* To Exclude Irrelevant And  
23 Highly Prejudicial Portions of Plaintiffs' Trial Exhibit, Bates Stamped TSA-CRT-00077732  
24 ("Exhibit 1"), which has been designated as "Highly Confidential" pursuant to the Protective  
25 Order.

26 5. Exhibit 1 is a true and correct copy of Plaintiffs' certified translation of TSA-  
27 CRT00077732. Exhibit 1 contains, cites, identifies and/or compiles confidential, non-public and  
28 sensitive business information, including confidential information concerning SDI's prices. It also

